

DAN RAYFIELD  
Attorney General  
NATHAN K RIEMERSMA #164699  
MATTHEW MAILE # 181761  
Assistant Attorney General  
CARTER BRACE #243828  
Honors Attorney General  
Department of Justice  
1162 Court Street NE  
Salem, OR 97301-4096  
Telephone: (503) 947-4700  
Fax: (503) 947-4791  
Email: Nathan.K.Riemersma@doj.oregon.gov  
matthew.maile@doj.oregon.gov  
carter.brace@doj.oregon.gov  
Attorneys for Defendants

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF OREGON

J.B.,

Plaintiff,

v.

LEVI GRAY, JAYSON LEAK, PAUL  
KIZER, JOHN WALLACE, JAMIE  
DENNISON, FELIPE URZUA-PEREZ,  
STEPHEN MARTIN, THOMAS JOST,  
ROBERT YONALLY, LISA ARRINGTON,  
CHAD NAUGLE, NICOLE BROWN, MIKE  
REESE, and JOHN DOE,

Defendants.

Case No. 3:23-cv-01962-CL

DEFENDANTS' MOTION FOR EXTENSION  
OF TIME TO FILE ANSWER

Counsel, Nathan Riemersma, certifies pursuant to L.R. 7-1(a)(1)(A) that counsel has conferred with Plaintiff's counsel Lynn Walsh, and she does not object to this motion.

## MOTION

Defendants Jayson Leak, Paul Kizer, John Wallace, Jamie Dennison, Felipe Urzua-Perez, Stephen Martin, Thomas Jost, Robert Yonally, Lisa Arrington, Chad Naugle, Nichole Brown, and State of Oregon through undersigned counsel, as well as newly named Defendant David Gonzalez making this limited appearance through undersigned counsel to respectfully move the Court for a 14-day extension of time up to and including March 21, 2025, within which to obtain representation authority pursuant to ORS 180.060(8) for the newly named state defendant David Gonzalez and file the Answer.

This request is made in good faith and not for the purposes of delay, and is supported by the declaration of Nathan Riemersma, Assistant Attorney General, and the records and files herein.

DATED March 7, 2025.

Respectfully submitted,

DAN RAYFIELD  
Attorney General

s/ Nathan K Riemersma  
NATHAN K RIEMERSMA #164699  
MATTHEW MAILE #181761  
Assistant Attorney General  
CARTER BRACE #243828  
Honors Attorney General  
Trial Attorney  
Tel (503) 947-4700  
Fax (503) 947-4791  
Nathan.K.Riemersma@doj.oregon.gov  
matthew.maile@doj.oregon.gov  
carter.brace@doj.oregon.gov  
Of Attorneys for Defendants